

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GINA WILLIAMS,

Civ. No. 18-5912 (JGK)

Plaintiff,

**JOINT FRCP 26(f) REPORT
AND DISCOVERY PLAN**

- against -

THE NEW YORK CITY HOUSING AUTHORITY,
CAROLYN JASPER, CESAR GONZALEZ,
MATTHEW HOFFMAN, RODNEY DAVIS, and
THELMA WATKINS,

Defendants.

Pursuant to Federal Rule of Civil Procedure 26(f), Plaintiff Gina Williams (“Plaintiff”) and Defendants New York City Housing Authority, Carolyn Jasper, Cesar Gonzalez, Matthew Hoffman, Rodney Davis, and Thelma Watkins (collectively, “Defendants”), jointly submit this Rule 26(f) Report and Discovery Plan.

I. RULE 26(f) CONFERENCE

The parties conferred by telephone on April 1, 2019, and by e-mail thereafter.

II. INITIAL DISCLOSURES

Plaintiff served her initial disclosures on October 18, 2018 and amended initial disclosures on October 30, 2018. Defendants served their initial disclosures on October 12, 2018.

III. SUBJECTS AND NATURE OF DISCOVERY

The parties anticipate serving interrogatories and document requests for any information not provided pursuant to mandatory disclosure, as well as taking depositions. The parties do not

anticipate the need for interrogatories or depositions beyond the maximum number provided by the Federal Rules of Civil Procedure. The parties reserve the right to raise any appropriate objections concerning the scope, burden, and form of production upon receipt of requests.

a. DISCOVERY BY PLAINTIFF

Plaintiff anticipates the scope of her discovery of all defendants' folders, any Inspector General complaints filed against non-municipal defendants. Any lawsuits filed against defendants. Defendants failed to comply with Plaintiff's discovery request and interrogatories. Only received denials and over burdensome responses. Plaintiffs anticipate for defendants to comply.

b. DISCOVERY BY DEFENDANTS

Defendants anticipate the scope of their discovery will include taking depositions of Plaintiff and any material witnesses disclosed through discovery. The anticipated subjects of discovery will include the circumstances concerning: (1) Plaintiff's performance; (2) Plaintiff's transfer; (3) the issuance of counseling memoranda to Plaintiff; (4) Plaintiff's local hearing and resulting reprimand; and (5) Plaintiff's damages.

IV. ELECTRONICALLY STORED INFORMATION

The parties agree that they will produce electronically stored information on a compact disc or by other means most convenient for the parties.

The parties reserve the right to raise any appropriate objections concerning the scope, burden, and form of production of electronic discovery upon receipt of Plaintiff's requests.

**V. ISSUES ABOUT CLAIMS OF PRIVILEGE OR OF PROTECTION
OF TRIAL-PREPARED MATERIALS**

The parties do not anticipate any issues regarding privilege or of protection of trial-preparation materials but reserve the right to bring such issues to the Court if necessary.

**VI. CHANGES IN THE LIMITATIONS ON DISCOVERY IMPOSED
UNDER THE FEDERAL RULES OF CIVIL PROCEDURE OR
LOCAL RULE**

None.

**VII. OTHER ORDERS THE COURT SHOULD ISSUE UNDER RULE
26(c) OR 16(b) AND (c)**

None.

VIII. PROPOSED JOINT DISCOVERY PLAN

- a. Deadline to provide properly executed authorizations/releases: April 19, 2019
- b. Completion of fact discovery: June 28, 2019
- c. Completion of expert discovery: August 30, 2019

Dated: New York, New York

April 8, 2019

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